

March 2, 2017

**VIA ECF**

The Honorable Alvin K. Hellerstein, U.S.D.J.  
United States District Court for the Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *Sharma v. Theatre Development Fund, Inc.*  
Case No.: 1:17-cv-00189-AKH

Dear District Judge Hellerstein:

Our law firm represents defendant Theatre Development Fund, Inc. ("TDF") in the above-referenced case. We write pursuant to Rule 1.D. of the Court's Individual Rules to request an enlargement of time for TDF to respond to the complaint. Counsel for the parties are in active discussions regarding this case. TDF has turned over certain documents to plaintiff's counsel, and plaintiff's counsel have represented that they need additional time to review and assess same.

Under the current schedule, TDF's response to the complaint would otherwise be due today, March 2, 2017. The parties are cognizant of the fact that this request is being made less than 48 hours before the scheduled deadline but jointly and respectfully request an extension of time to conduct this document and information exchange. This represents the second request for such an enlargement of time. The Court granted the prior request, upon consent (ECF Document 10).

Therefore, the parties jointly and respectfully request that the time for TDF to respond to the complaint be enlarged by thirty days, to April 3, 2017.

Respectfully submitted,

*David Grech*

David J. Grech

cc: Chambers (*via fax*)  
All Attorneys of Record (*via ECF*)